

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

ZHEN ZHOU WU a/k/a ALEX WU,  
YUFENG WEI a/k/a ANNIE WEI,  
BO LI a/k/a ERIC LEE, CHITRON  
ELECTRONICS, INC., and CHITRON  
ELECTRONICS COMPANY LIMITED  
a/k/a CHI-CHUANG ELECTRONICS  
COMPANY LIMITED,

Defendants

Crim. No. 08-cr-10386-PBS

**MOTION OF ZHEN ZHOU WU TO SUPPRESS CERTAIN STATEMENTS  
AND THE SEARCH OF HIS COMPUTER**

Defendant Zhen Zhou Wu, a/k/a Alex Wu (“Wu”), respectfully moves pursuant to the Federal Rules of Criminal Procedure 12 and 41(h) to suppress certain statements he made to government officers prior to his formal arrest and before being warned of his Miranda rights in Chicago O’Hare International Airport, and to suppress the subsequent search of his laptop computer. For the reasons stated in the accompanying memorandum, the statements were obtained in violation of Wu’s rights, and the statements and all derivative evidence obtained as a result must be suppressed.

Defendant believes that the facts at issue are uncontroverted and an evidentiary hearing is therefore not required. If, however, the government disputes any of the facts, then an evidentiary hearing on this motion is requested.

Respectfully submitted,

/s/ Donald K. Stern

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